

CONFIDENTIAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE THE RESERVE FUND  
SECURITIES AND DERIVATIVE  
LITIGATION

MDL No. 09-md-2011 (PGG)

AMERIPRISE FINANCIAL SERVICES,  
INC. and SECURITIES AMERICA, INC.,

No. 09-cv-1288 (PGG)

Plaintiffs,

v.

THE RESERVE FUND, RESERVE  
MANAGEMENT COMPANY, INC., and  
BRUCE R. BENT,

Defendants.

USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/29/10

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING FILING OF SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a)(2), plaintiffs Ameriprise Financial Services, Inc. and Securities America, Inc. (collectively, "Ameriprise") and defendants Reserve Management Company, Inc. and Bruce R. Bent (collectively, "Defendants") stipulate to the filing of Ameriprise's Second Amended Complaint in this action. By signature of their counsel below, Defendants hereby consent in writing to the filing of this amended pleading to be due no later than March 26, 2010.<sup>1</sup>

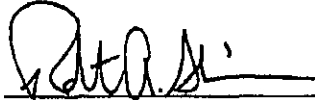
<sup>1</sup> Counsel for Ameriprise conferred with counsel for defendant The Reserve Fund (the "Fund") regarding its consent to filing of the Second Amended Complaint. The Fund stated its position that its consent is unnecessary, in light of the Court's Order of November 25, 2009 enjoining claims against the Fund and the fact that no claims are asserted against Fund in the Second Amended Complaint.

Ameriprise and the Defendants further stipulate that the Defendants' time to move, answer or otherwise respond to the Complaint in the above-captioned action is extended to and including April 26, 2010.

Ameriprise and the Defendants further stipulate that, except as set forth above, the schedule set forth in the action captioned *In re The Reserve Primary Fund Securities & Derivative Class Action Litigation*, No. 08-CV-8060 (PGG) shall govern this action as well.

Dated: March 25, 2010

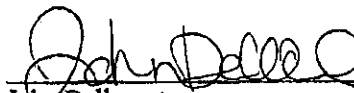
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*Counsel for Plaintiffs Ameriprise Financial Services, Inc. and Securities America, Inc.*

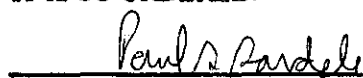
DUANE MORRIS LLP



John Dellaportas  
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New York, NY 10036-4086  
212-692-1000

*Counsel for Defendants Reserve Management Company, Inc. and Bruce R. Bent*

IT IS SO ORDERED:

  
Paul G. Gardephe  
United States District Judge

March 27, 2010